DEPT. OF TRANSPORTATION

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December 18, 2008

Docket Management Facility US Department of Transportation 1200 New Jersey Avenue SE West Building Ground Floor Room W-12-140 Washington DC 20590-0001

RE: Docket ID: FMCSA-2008-0363

The Notice of Proposed Rulemaking (NPRM) for the National Registry of Certified Medical Examiner program requests input to the docket. The individuals listed below would like to enter the following comments to the docket.

The NRCME will improve highway safety by identifying drivers that should be medically disqualified from driving, while reducing the number of hardships caused by erroneous disqualifications. The required training and testing proposed by FMCSA will reduce these errors by increasing medical examiner expertise. These errors appear mostly to be caused by limitations in medical examiner knowledge of Federal Medical Guidelines, and are not likely the result of an inability to perform the medical examination. Certification will raise the quality and conformity of the CMV driver medical examination.

Doctors of Chiropractic are portal of entry physicians that lawfully perform the CMV driver medical examination in 49 of the 51 regulated jurisdictions. The Council on Chiropractic Education (CCE) is the agency recognized by the U.S. Secretary of Education for accreditation of programs and institutions offering the doctor of chiropractic degree. Graduates of CCE approved chiropractic colleges must pass a fourpart credentialing examination in the basic and clinical sciences administered by the National Board of Chiropractic Examiners (NBCE). The NBCE is responsible for the preparation and administration of the national examinations while state licensing boards prepare and administer additional examinations that govern the state scope of practice. Evidence supporting the chiropractic profession's training and skill to perform the CMV medical examination is available from these organizations.

As the opportunity to participate in the NRCME approaches, we the undersigned Doctors of Chiropractic feel it is imperative to include the skills of the chiropractic profession to answer the need for a sufficient number of qualified medical examiners.

We support the proposed training and certification test requirements and look forward to significantly contributing to the ranks of Certified Medical Examiners as individuals and as a profession.

Respectfully submitted by the following:

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